

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK (BROOKLYN)**

MORRIS MANOPLA,
Plaintiff,

CASE NO. 1:19-cv-00992

vs.

**TRANS UNION, LLC'S NOTICE OF
REMOVAL**

EXPERIAN; EQUIFAX;
TRANSUNION and MR. COOPER
aka NATIONSTAR MTG LLC;
Defendants.

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, improperly identified as Transunion, ("Trans Union") hereby removes the subject action from the Civil Court Of The City Of New York, County of Kings, to the United States District Court for the Eastern District of New York, on the following grounds:

1. Plaintiff Morris Manopla served Trans Union on or about February 13, 2019, with a Summons and Complaint For Violations Of The FCRA, in the Civil Court of the City of New York, County of Kings. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**, respectively. Trans Union has not been served with any other process, pleadings or orders.

2. Plaintiff makes claims under, alleges that Defendants violated and alleges that Defendants are liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. (the "FCRA"). See Complaint ¶¶ 1, 16-30, 36-48.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Civil Court of the City of New York, County of Kings, to the United States District Court for the Eastern District of New York.

5. Counsel for Trans Union has contacted the Clerk of the Civil Court of the City of New York, County of Kings, by telephone, and confirmed that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served, as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Civil Court of the City of New York, County of Kings, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Civil Court of the City of New York, County of Kings, to this United States District Court, Eastern District of New York.

Date: February 19, 2019.

Respectfully submitted,

/s/ Camille R. Nicodemus

Camille R. Nicodemus, Esq. (NY #2807451)

Schuckit & Associates, P.C.

4545 Northwestern Drive

Zionsville, IN 46077

Telephone: (317) 363-2400

Fax: (317) 363-2257

E-Mail: cnicodemus@schuckitlaw.com

*Counsel for Defendant Trans Union, LLC
(improperly identified as Transunion)*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **19th day of February, 2019**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

| | |
|-------|--|
| None. | |
|-------|--|

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **19th day of February, 2019**, properly addressed as follows:

| | |
|---|--|
| <u>for Plaintiff Morris Manopla</u> Edward B. Geller, Esq. Edward B. Geller, Esq., P.C. 15 Landing Way Bronx, NY 10464 | |
|---|--|

/s/ Camille R. Nicodemus

Camille R. Nicodemus, Esq. (NY #2807451)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: (317) 363-2400
Fax: (317) 363-2257
E-Mail: cnicodemus@schuckitlaw.com

*Counsel for Defendant Trans Union, LLC
(improperly identified as Transunion)*